

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

IN RE:)
BRUCE L. MCMULLEN and)
REBECCA J. MCMULLEN) CASE NO. 15-90429-BHL-13
Debtors.)

MOTION FOR POST-CONFIRMATION MODIFICATION OF CHAPTER 13 PLAN

Come now Debtors, by and through counsel, N. Alan Miller III, and respectfully move the Court to modify the Plan post-confirmation, pursuant to 11 USC 1329. In support of this motion, Debtors state the following:

1. On March 20, 2015, Debtors filed a petition for relief under Chapter 13 of the Bankruptcy Code. The Chapter 13 Plan was confirmed on May 12, 2015.
2. In order to address certain claims filed with the Chapter 13 Standing Trustee, and other outstanding issues regarding this matter, it is necessary to modify the Plan as follows:
 - a. The claim filed by Personal Finance (Claim #3) shall be treated as a secured claim in the amount of \$750.00 at 4% interest. The balance of the claim shall be deemed unsecured.
3. Other than as set out above, the Debtors' previously filed Chapter 13 Plan shall remain in full force and effect.
4. This modification is reasonable and feasible, represents the current best efforts of the Debtors, is in the best interests of the creditors, and otherwise complies with the requirements of 11 USC 1329.

WHEREFORE, Debtors pray that this motion be granted and for all other relief just and proper in the premises.

Respectfully submitted,
/s/ N. Alan Miller III
N. Alan Miller III, #25708-15
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/s/ Bruce L. McMullen
Bruce L. McMullen

/s/ Rebecca J. McMullen
Rebecca J. McMullen

NOTICE IS GIVEN that any objection must be filed with the Bankruptcy Clerk within **21 days** from date of service or such other time period as may be permitted by Fed.R. Bankr.P. 9006(f). Those not required or not permitted to file electronically must deliver any objection by U.S. mail, courier, overnight/express mail, or in person at:

United States Bankruptcy Court, Southern District of Indiana
New Albany Division
110 US Courthouse
121 W. Spring Street
New Albany, IN 47150

The objecting party must ensure delivery of the objection to the party filing the motion, and the trustee. **If an objection is NOT timely filed, the requested relief may be granted.**

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was delivered personally or by regular U.S. mail, postage prepaid on September 21, 2015 to:

Joseph M. Black, Jr.
Chapter 13 Trustee
P.O. Box 846
Seymour, IN 47274

U.S. Trustee
101 W. Ohio Street, Suite 1000
Indianapolis, IN 46204

/s/ N. Alan Miller III
N. Alan Miller III